



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JANE DOE, a minor, by next friend MARY
DOE, and MARY DOE, individually,

Plaintiffs,

v.

TENNESSEE STATE UNIVERSITY,
TAMARA BARNHILL, in her individual
capacity, MELISSA ASHMORE, in her
individual capacity, ALTIE JORDAN, in her
individual capacity, MINI ROCKSTARS
CHILD CARE CENTER, CO, MINI
ROCKSTARS CHILD CARE &
ENRICHMENT CENTER, INC., and
WILLIAM ROBINSON,

Defendants.

Case No. 3:25-cv-00683

Judge Trauger

JURY DEMANDED

PLAINTFFS' MOTION TO PROCEED PSEUDONYMOUSLY

I. INTRODUCTION

Pursuant to Rule 5.2 of the Federal Rules of Civil Procedure, Plaintiffs Jane Doe and Mary Doe (collectively, "Plaintiffs") respectfully submit this Motion to Proceed Pseudonymously.

As set forth in the Complaint, Jane Doe is a three-year-old victim of sexual abuse in the Early Head Start program where she was enrolled. [ECF 1 at ¶¶ 1, 6]. Her legal guardian, Mary Doe, brought this action on her own behalf and as the next friend of Jane Doe. [*Id.* at ¶ 5]. Plaintiffs seek to proceed pseudonymously to protect the identity of Jane Doe.